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8 Attorneys for Defendants
9 CITY OF SANTA ROSA; RICH CELLI, an individual and Officer of the
10 SANTA ROSA POLICE DEPARTMENT; TRAVIS MENKE,
11 an individual and Officer of the SANTA ROSA POLICE DEPARTMENT;
12 and PATRICIA MANN, an individual and Officer of the
13 SANTA ROSA POLICE DEPARTMENT

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18 UNITED STATES DISTRICT COURT
19 NORTHERN DISTRICT OF CALIFORNIA

20 PATRICIA DESANTIS, et al.,

21 Case No. C 07-3386 JSW

22 Plaintiffs,

23 v.
24 CITY OF SANTA ROSA, et al.,

25 Defendants.

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28 **STIPULATION AND [PROPOSED]
ORDER PERMITTING AMENDMENT
TO PLAINTIFFS' BILL OF COSTS**

29 WHEREAS Plaintiffs Patricia DeSantis and Dani DeSantis filed a Bill of Costs on
30 October 5, 2012;

31 WHEREAS Plaintiffs claim, and defendants object to, costs "related to preparing charts,
32 diagrams, videotapes and other visual aids at trial..." (Par. 5c and Exhibit "F": Thinktwice Inc.
33 Invoice) and "videotaped deposition[s]" (Par. 6 and excerpts of Exhibit "G": various invoices
34 detailing videotaped deposition costs);

35 WHEREAS counsel for defendants and plaintiffs have met and conferred pursuant to
36 Local Rule 54-2, and agree to defer litigation of the dispute re costs as follows;

37 Subject to the approval of the court, the parties to the above-entitled action, and by their
38 respective counsel, stipulate that:

39 1. Plaintiffs shall file an amended Bill of Costs deleting costs claims "related to preparing

1 charts, diagrams, videotapes and other visual aids at trial..." (Par. 5c and Exhibit "F":
2 Thinktwice Inc. Invoice) and "videotaped deposition[s]" (Par. 6 and excerpts of Exhibit
3 "G": various invoices detailing videotaped deposition costs). The amended Bill of Costs
4 shall be deemed timely filed.

5 2. Plaintiffs reserve, and this Stipulation is without prejudice to, the right to claim costs
6 "related to preparing charts, diagrams, videotapes and other visual aids at trial..." (Par. 5c
7 and Exhibit "F": Thinktwice Inc. Invoice) and "videotaped deposition[s]" (Par. 6 and
8 excerpts of Exhibit "G": various invoices detailing videotaped deposition costs) pursuant
9 to 42 U.S.C. §1988.

10 3. Defendants reserve, and this Stipulation is without prejudice to, the right to object to costs
11 "related to preparing charts, diagrams, videotapes and other visual aids at trial..." (Par. 5c
12 and Exhibit "F": Thinktwice Inc. Invoice) and "videotaped deposition[s]" (Par. 6 and
13 excerpts of Exhibit "G": various invoices detailing videotaped deposition costs) pursuant
14 to 42 U.S.C. §1988.

15
16 Dated: October 12, 2012

/s/

17 Caroline L. Fowler
18 City Attorney
19 Attorney for Defendants
20 CITY OF SANTA ROSA, Santa Rosa Police Officers
21 RICH CELLI, TRAVIS MENKE, and PATRICIA
22 MANN

23
24 LAW OFFICES OF AMITAI SCHWARTZ

25
26 Dated: October 12, 2012

/s/

27 Amitai Schwartz
28 Attorneys for Plaintiff
PATRICIA DESANTIS

ORDER

29 Pursuant to the stipulation of the parties and for good cause shown, **IT IS SO**
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ORDERED.

31 Dated: October 15, 2012



32 HONORABLE JEFFREY S. WHITE
33 United States District Judge